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March 8, 2002

William Caton
Acting Secretary
Federal Communications Commission
455 12th Street SW
Portals II Building
Washington DC 20544

Re: Joint Petition Seeking Expedited Rulemaking To Establish Minimum Notice Requirements For Recently Detariffed Services (CI Docket No. 02-22)

Dear Mr. Caton:

The Montana Public Service Commission submits the comments below in support of the Joint Petition Seeking Expedited Rulemaking to Establish Minimum Notice Requirements for Recently Detariffed Services.

This Commission has received complaints and inquiries from consumers who place long distance calls expecting certain rates, unaware that those rates may have changed without notice. These consumers have felt strongly that long distance carriers should be required to provide their customers with effective advance notice of rate changes.

In its detariffing order the FCC may have expected that under contract or consumer protection laws customers would receive advance notice of changes in rates and terms; however, such notification has not fully materialized. Although some long distance carriers do provide advance notice of changes directly to their customers via bill statements or otherwise, many carriers simply place the updated rates on their websites.

Requiring consumers to seek out the current rate being charged by their long distance carrier prior to placing long distance calls places an unreasonable burden on the consumer. Although long distance carriers are required to post their current rates on their websites, not all Montana consumers have readily-available access to the internet so they are not able to use that method to verify current rates prior to placing long distance calls. Some carriers have indicated that price increase information will be made available via a recorded announcement accessed through a toll-free number. This means of verifying rate information prior to placing long distance calls is also burdensome on the consumer.

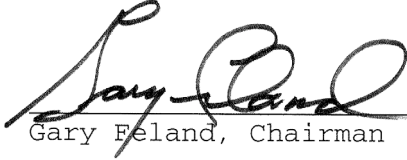
Mr. William Caton

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Requiring long distance carriers to provide advanced written notice of changes in rates, terms, and conditions would be in the consumer's best interest. For all the reasons identified by the Joint Petitioners, the Montana PSC encourages the FCC to establish minimum notice requirements for detariffed long distance services.

Sincerely,



Gary Eland, Chairman

GF:TS:rs